

MUS3570391.1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DEIDRA HUBAY, ROBERT LOSIENIECKI,)	
JESSICA DORANTES and ALEXIS)	
GABRIELLE HERRICK,)	Civil Action No. 2:19-cv-01327-NR
)	
Plaintiffs,)	
v.)	
)	JURY TRIAL DEMANDED
JANELLE MARINA MENDEZ, PAMELA)	
HEAL and MILITARY SEXUAL TRAUMA)	
MOVEMENT,)	
)	
Defendants.)	

**JOINT MOTION TO CONVERT CROSS MOTIONS FOR PRELIMINARY
INJUNCTION INTO CROSS MOTIONS FOR DECLARATORY JUDGMENT**

AND NOW COME the parties, by and through their attorneys, and respectfully submit this Joint Motion to Convert the Cross Motions for Preliminary Injunction into Cross Motions for Declaratory Judgment pursuant to this Honorable Court's suggestion on the record on May 13, 2020:

1. At the suggestion of this Honorable Court after the conclusion of the second day of testimony on the parties Cross Motions for Preliminary Injunction, the parties have discussed converting these Motions into Cross Motions for Declaratory Judgment.
2. Based on those discussions, the parties now jointly agree, stipulate and move to convert the pending Cross Motions for Preliminary Injunction, and the corresponding issues and claims presented by both parties, into Cross Motions for Declaratory Judgment.

WHEREFORE, the parties respectfully request that this Honorable Court grant this Joint Motion and accept the evidence, testimony, and arguments presented in this action during the hearings held on May 8th and 13th, 2020, in connection with Cross Motions for Declaratory

Judgment as to the issues and claims presented by both parties in the pending Cross Motions for Preliminary Injunction.

Respectfully submitted,

/s/ David G. Oberdick

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 3rd day of June, 2020, a copy of the foregoing *Joint Motion to Convert Cross Motions for Preliminary Injunction into Cross Motions for Declaratory Judgment* was electronically served on all registered parties using the Court's ECF system, including:

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